That is, each of the claims requires that multiple compression tables be used for compression of an overall image by application of the tables to individual sub-regions. This is true of all of independent claims 1, 12, 18 and 24. Although the Examiner rejected the claims based upon two separate references in the case of independent claims 12 and 18, and their respective dependent claims, the Hirabayashi et al. reference was used in support of the portion of the rejection relating to the use of multiple code tables.

The Hirabayashi et al. reference has been analyzed, once again, in great detail. The reference is not believed to teach or even suggest the use of multiple code tables *for actually encoding an overall image.* Rather, multiple tables are employed by Hirabayashi et al. as starting points for evaluating to what level an image should be subdivided for optimal compression.

Referring specifically to the reference, several variants of a basic compression method are described. In the first, and more generic form, sets of reference Huffman tables are starting points for a compression of blocks of different sizes, such as from 4-pixel square blocks to 128-pixel square blocks. The procedure proceeds through the subdivision of an image into these various block sizes. Code tables are then applied to the blocks to determine statistics relating to the compression characteristics obtainable through both the block division and the use of the compression tables. The tables are, in fact, redefined in real time during the process, with the reference tables merely serving as starting points for the eventual encoding that will take place. See, e.g., column 7, lines 38-57.

However, it does not appear from the reference that these various code tables ever serve, together, for encoding the image. Rather, one reading the reference would conclude that a single table is ultimately selected for encoding the various blocks, with the candidate tables merely serving as options for the eventual encoding, in connection with the appropriate selection of the block sizes.

In column 8, lines 13-16 of the reference, for example, reference is made to Figure 10 which is said to represent a train of encoded data resulting from the process. As clearly seen in Figure 10, the entire image, referred to in the figure as "one image" includes optimal Huffman table data as a first portion of the string, followed by reference information, which itself includes the block division information and the encode method. It should be noted that the encode method includes more than simply the code table information, with several code methods being available. Significantly, Figure 10 *does not* refer to multiple Hoffman tables. Indeed, it is difficult to imagine how multiple tables could be utilized if a single table is defined in the ultimate compressed data train. Similarly, Figure 9 is a flow chart that represents the actual encoding process. At step S80, clearly, a single Huffman table is used. That is, even though multiple blocks may be encoded, as indicated by the loop from step S84 returning to step S81, this sequential encoding of multiple blocks *does not* include redefinition or use of other tables. Accordingly, nothing in the reference would teach or suggest that multiple different tables could or should be used for encoding the different subregions. The tables referred to by the Examiner and by the reference itself appear simply to be candidate tables to be considered in conjunction with the different block sizes available for encoding.

Similarly, in the alternative embodiments taught by Hirabayashi et al., a single table is again utilized. For example, as clearly described in column 9, lines 54-59, a Huffman encoder 109 prepares "a presumably optimum Huffman table." The resulting data, as illustrated in Figure 13, includes a single block entitled "Huffman Table." The block *is not* entitled "Huffman Tables." While it appears that this embodiment permits multiple difference mode techniques to be used, as indicated by the difference mode information, this flexibility does not extend to the use of multiple Huffman tables. Again, a single table is employed. In text, the reference simply states that "in this operation, *the Huffman table* prepared in the difference frequency counter 107 is attached to each image frame for use in the decoding operation." See column 10, lines 6-9 (emphasis added).